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April 26, 2004

**BY HAND AND BY E-MAIL**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: NStar Companies, D.T.E. 03-121

Dear Secretary Cottrell:

Enclosed for filing in the above-referenced proceeding is Joint Supporters First Set Of Information Requests To NSTAR Electric. This filing is made pursuant to the Hearing Officers order of April 22, 2004, permitting information requests to be filed today based on NSTAR Electric testimony filed the previous day, April 21, 2004.

The Joint Supporters received NSTAR Electric's rebuttal testimony from three witnesses, which included two new witnesses and a revised case filed by the witness who sponsored NSTAR Electric's initial direct testimony, three business days ago on the afternoon of April 21. Two business days ago, on Thursday, April 22, the Hearing Officer informed the parties that discovery on the rebuttal testimony, including NSTAR Electric's revised case, would be due in two business days by close of business on Monday, April 26, 2004. It is not possible for the Joint Supporters to adequately review and analyze NSTAR Electric's rebuttal testimony and revised case and to prepare its complete discovery within the two business days granted to it under the current schedule. The Joint Supporters respectfully reserve the right to issue further discovery as it continues to examine NSTAR Electric's rebuttal testimony and revised case.

Please acknowledge receipt by stamping the enclosed copy of this letter and returning it to the messenger. Thank you.

Sincerely,



Bruce S. Barnett

BSB/Inf  
Enclosure

cc: William Stevens, Hearing Officer (by hand)  
John Cope-Flanagan, Hearing Officer (by hand)  
Sean Hanley (by hand)  
Claude Francisco (by hand)  
Xuan Yu (by hand)  
Robert Harrold (by hand)  
Jeff Hall (by hand)  
Joseph Passaggio (by hand)  
Meera Bhalotra (by hand)  
D.T.E. 03-121 Service List (By U.S. mail or e-mail)

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

	)	
Boston Edison Company	)	
Cambridge Electric Light Company	)	D.T.E. 03-121
Commonwealth Electric Company	)	
d/b/a NSTAR Electric	)	
	)	

**JOINT SUPPORTERS FIRST SET OF INFORMATION REQUESTS TO  
NSTAR ELECTRIC**

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-JS-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if the Joint Supporters or their witnesses receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to “any and all”, “documentation”, “support”, and “justification” mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.

5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records, microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact Heather Hunt at (203) 380-1477 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

### **Information Requests**

#### **Information Requests Relating to the Prefiled Rebuttal Testimony of Mr. Salamone**

- JS-NSTAR-1-1 Please provide copies of (1) all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Mr. Salamone to state and federal regulatory authorities from 1999 to the present; and (2) transcripts of Mr. Salamone’s testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- JS-NSTAR-1-2 Provide copies of all regulatory decisions addressing the issues covered by Mr. Salamone in testimony provided in response to Information Request JS-NSTAR-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.
- JS-NSTAR-1-3 At Pages 5 and 6, Mr. Salamone testifies on the concept of the normal rating and the emergency capacity rating of distribution system elements, mentioning explicitly two elements in distribution stations, transformer and circuit breakers (page 5 line 22). Previously at Page 4, lines 18-20, Mr. Salamone testifies that “(H)ourly load data is [sic] maintained within company computer databases for the prior two years.”

- A. Using the data from these databases, please identify each distribution system element that experienced a load in excess of the normal rating for that element during the prior two years.
- B. For each element identified in response to A, provide
  1. The normal rating for that element
  2. The emergency capacity rating of that element
  3. The time period for which the normal rating for that element can be exceeded for a single load cycle.
- C. For each element identified in response to A, provide a list of hours when the normal rating for that element was exceeded.
- D. For each hour identified in response to C, provide the hourly load.
- E. For each element identified in response to A, provide a list of hours when the emergency capacity rating for that element was exceeded.
- F. For each hour identified in response to E, provide the hourly load.

JS-NSTAR-1-4 On Page 5, Mr. Salamone discusses customer load patterns being driven by extreme weather conditions, claiming “Customer peak demands during these conditions exhibit very little diversity from their individual peak demands with diversity factor values ranging from 95 percent to 100 percent.”

- A. Please provide an operable definition of “extreme weather conditions” and identify the hours since 1999 of the extreme weather conditions which meet this definition.
- B. For each of the hours identified in A, provide the total demand for each of the NSTAR Electric companies.
- C. For each NSTAR Electric customer with self generation, provide an Excel formatted spreadsheet showing
  1. The loads during each of the hours identified in A
  2. The individual peak demands for the same month as the identified hour
  3. The metered energy for the same month as the identified hour
  4. The individual peak demands for the same year as the identified hour

5. The metered energy for the same year as the identified hour
  6. Calculated diversity factor
- D. For each NSTAR Electric customer with a peak demand in excess of 100 KW and without self generation served under G-2, G-3, or T-2 tariff, provide an Excel formatted spreadsheet showing
1. The loads during each the hours identified in A
  2. The individual peak demands for the same month as the identified hour
  3. The metered energy for the same month as the identified hour
  4. The individual peak demands for the same year as the identified hour
  5. The metered energy for the same year as the identified hour
  6. Calculated diversity factor

JS-NSTAR-1-5 At Page 7, Lines 5-7, Mr. Salamone testified that “Diversity factors for substations are generally lower than for individual circuits, but remain in the 92 to 98 percent range.” At Page 7, Lines 21-22, Mr. Salalmone testified that “Substation diversity factors generally range from 90 percent up to 95 percent.”

- A. Provide appropriate definitions of “substations” that differentiate between that term as used in the quotation on Lines 5-7 versus the quotation from Line 21-22.
- B. For each individual NSTAR Electric circuit, provide an Excel formatted spreadsheet showing
  1. The loads during each of the hours identified in the response to JS-NSTAR-1-4-A
  2. The individual peak demands for the same month as the identified hour
  3. The metered energy for the same month as the identified hour
  4. The individual peak demands for the same year as the identified hour
  5. The metered energy for the same year as the identified hour
  6. Calculated diversity factor

C. For each NSTAR Electric substation, provide an Excel formatted spreadsheet showing

1. The loads during each of the hours identified in the response to JS-NSTAR-1-4-A
2. The individual peak demands for the same month as the identified hour
3. The metered energy for the same month as the identified hour
4. The individual peak demands for the same year as the identified hour
5. The metered energy for the same year as the identified hour
6. Calculated diversity factor

JS-NSTAR-1-6 Provide copies of all load research studies including Excel formatted files of the supporting data conducted by or on behalf of NSTAR Electric since 1999

- A. That deal with customers with distributed generation
- B. That deal with commercial and industrial customers in general

JS-NSTAR-1-7 Mr. Salamone at Page 14 and elsewhere discusses significantly different treatment for customers over 1 MW.

- A. Provide copies of all internal company memos, meeting minutes, correspondence, analysis, and work papers, including all distribution planning guidelines, that indicate different treatment for customers for customers over 1 MW.
- B. Provide the date associated with each document produced in response to A.
- C. Identify each customer served by NSTAR Electric with a peak demand in excess of 1 MW
- D. For each customer identified in C, provide in Excel format
  - 1 The peak demand for that customer
  2. The date that the customer's peak demand exceeded 1 MW for the first time
  3. The size of distributed generation on the customer's site, if any.

**Information Requests Relating to the Prefiled Rebuttal Testimony of Ms. Parmesano**

- JS-NSTAR-1-8 Please provide copies of (1) all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Ms. Parmesano to state and federal regulatory authorities and legislative bodies from 1999 to the present; and (2) transcripts of Ms. Parmesano's testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present.
- JS-NSTAR-1-9 Provide copies of all regulatory decisions addressing the issues covered by Ms. Parmesano in testimony provided in response to Information Request JS-NSTAR-1-8. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.

**Information Requests Relating to the Prefiled Rebuttal Testimony of Mr. LaMontagne**

- JS-NSTAR-1-10 At P. 16 Mr. LaMontagne testifies that many DG customers may elect to sell their fuel simultaneously at attractive market prices.
- A. Provide all available information regarding the relationship of fuel costs experienced by DG systems to the fuel costs experienced by the providers of wholesale energy that is delivered by NSTAR.
  - B. Provide all available documents on other information regarding the current fuel diversity of DG and how this diversity is expected to change, shown as a percentage of DG users who currently use the same fuel sources.
  - C. Provide all available information regarding the percentages of DG users using the same fuel who also purchase such fuel under the same or similar contracting arrangements.